

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

SAMUEL L. PERKINS

Plaintiff,

v.

INTERNATIONAL PAPER,

Defendant.

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Case No. 1:02-CV-00432

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MOTION TO APPEAR PRO HAC VICE

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Michael A. Roberts, attorney for Defendant, International Paper Company, hereby moves this Court for an order granting Mary Jane Palmer leave to appear in this matter *pro hac vice* and states as follows:

1. Mary Jane Palmer is a member in good standing of the Bar of each court in which she is admitted to practice and is eligible to practice in all of said courts. See Declaration of Mary Jane Palmer, ¶ 3 and Attachment 1 thereto, attached hereto as Exhibit 1. Movant has never been the subject of disciplinary action by any bar or court, nor has she ever been denied admission to practice before any state or federal court. A Certificate of Good Standing from the United States District Court for the Western District of Tennessee is attached hereto as Attachment 2 to Exhibit 1.

2. Movant is employed as an in-house litigation attorney with International Paper Company, is familiar with the facts of this case, and International Paper Company desires her representation in the above-referenced case.

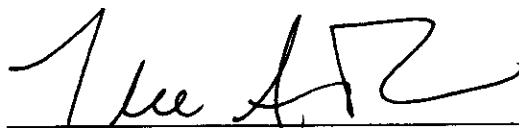
3. In order to adequately represent Defendant, Defendant will, from time to time, rely upon Mary Jane Palmer to make certain appearances before this Court.

4. A Declaration of Mary Jane Palmer in support of this Motion is attached hereto as Exhibit 1.

WHEREFORE, Defendant respectfully requests that Mary Jane Palmer be admitted to practice *pro hac vice* in the above-referenced action.

Respectfully submitted,

Dated: 1/15/4



Michael Roberts (0047129)  
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511 Walnut Street  
Cincinnati, Ohio 45202  
(513) 629-2799

Attorney for Defendant

**CERTIFICATE OF SERVICE**

I certify that I have served a copy of the foregoing Motion to Appear Pro Hac Vice upon James A. Whitaker, Whitaker Law Office, 226 Reading Road, Mason Ohio, 45040, by first class U.S. Mail, postage prepaid, this 15 day of January, 2004.



Michael Roberts